

EXHIBIT 15

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SPACE DATA CORPORATION,

Plaintiff,

vs.

ALPHABET INC., and GOOGLE
LLC,

Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
CONTINUED VIDEOTAPED 30(b)(6) DEPOSITION OF
GERALD MARK KNOBLACH
San Francisco, California
Monday, July 16, 2018
Volume 3

Reported by:

RACHEL FERRIER, CSR No. 6948

Job No. 2966005

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1 Avanti's communications recovery proposal in connection 04:46:00
2 with the hurricane recovery in Puerto Rico. 04:46:09
3 A Yes. This appears to be, as its title states, 04:46:12
4 "Maria PR1," which I assume refers to "Puerto Rico 1," 04:47:40
5 "Communications Recovery Plan September 2017." 04:47:44
6 Q And you were looking to get paid for providing 04:47:47
7 the services that you were going to provide; correct? 04:47:52
8 A We are a small company. We were looking to get 04:47:54
9 covered our costs of deploying and logistically 04:47:58
10 supporting our people there. 04:48:00
11 Q Just to cover your costs? 04:48:01
12 A Yes. I think that that was our goal in this, 04:48:03
13 just to cover our costs. We didn't want to make profit 04:48:06
14 on other people's adversity, and, you know, the -- the 04:48:08
15 benefit for us would have been the public relations and 04:48:14
16 the goodwill of providing this type of coverage, as long 04:48:17
17 as our costs were covered. 04:48:21
18 Q In your -- Avanti's proposal was not accepted? 04:48:22
19 A My understanding is we came in second place. 04:48:29
20 Q And what do you mean by that? 04:48:31
21 A I got a text from Jose, the CEO of Avanti, who 04:48:35
22 said we came in second place to Google Loon, and my 04:48:39
23 understanding is that Google Loon offered to do the 04:48:43
24 service for free, and it's difficult to compete with 04:48:45
25 free when, you know, you have got costs, and you are a 04:48:48

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1 small company. You don't have the in-depth pockets of a 04:48:53
2 Google to give our service away for nothing. Although, 04:48:56
3 in events like this, where, obviously, people's lives 04:49:02
4 are impacted, we wish we could. 04:49:05
5 Q And so your testimony is you received a text 04:49:08
6 message from Jose saying that you had come in second to 04:49:11
7 Google? 04:49:14
8 A Mm-hmm. 04:49:14
9 Q Okay. I'm not sure I've seen that text message. 04:49:15
10 Has that been produced in this case? 04:49:20
11 A I believe we produced a number of text messages, 04:49:21
12 and, you know, it may not be explicit in the text 04:49:25
13 message. I think the text message says we came in 04:49:30
14 second, and then there was quickly a press announcement 04:49:32
15 that Google Loon was going to provide high-altitude 04:49:33
16 support for communications in their recovery plan for 04:49:38
17 Puerto Rico, for Maria. So, obviously, they came in 04:49:39
18 first. 04:49:42
19 (Exhibit 1286 was marked for 04:49:42
20 identification by the Court Reporter.) 04:49:42
21 BY MR. WERDEGAR: 04:49:42
22 Q Let me show you Exhibit 1286. 04:49:43
23 Are these the text messages with Jose Negrón that 04:50:04
24 you were referring to, Mr. Knoblach? 04:50:08
25 A I want to review them. 04:50:09

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before
4 me at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were placed under oath; that a verbatim
7 record of the proceedings was made by me using machine
8 shorthand which was thereafter transcribed under my
9 direction; further, that the foregoing is an accurate
10 transcription thereof.

11 I further certify that I am neither financially
12 interested in the action nor a relative or employee of
13 any attorney or any of the parties.

14 IN WITNESS WHEREOF, I have this date subscribed
15 my name.

16
17 Dated: July 23, 2018
18
19
20
21

22 
23 _____

24 RACHEL FERRIER

25 CSR No. 6948